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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

RUSSELL PITKIN and **MARY PITKIN**,
Co-Personal Representatives of the Estate of
MADALINE PITKIN, Deceased,

Plaintiffs,
vs.

CORIZON HEALTH, INC., a Delaware Corporation; **CORIZON HEALTH, INC.**, a Tennessee Corporation; **WASHINGTON COUNTY**, a government body in the State of Oregon; **JOSEPH MCCARTHY, MD**, an individual; **COLIN STORZ**, an individual; **LESLIE ONEIL**, an individual; **CJ BUCHANAN**, an individual; **LOUISA DURU**, an individual; **MOLLY JOHNSON**, an individual; **COURTNEY NYMAN**, an individual; **PAT GARRETT**, in his capacity as Sheriff for Washington County; **JOHN DOES 1-10**; and, **JANE DOES 1-10**,

Defendants.

Case No. 3:16-cv-02235-AA

CORIZON HEALTH, INC.'S RESPONSE TO
PLAINTIFFS' THIRD REQUEST FOR
PRODUCTION

RESPONSES TO REQUESTS FOR PRODUCTION

Request for Production No. 56: A complete copy of all depositions and related exhibits

taken in the case of Derek Johnson, Personal Representative of Kelley Conrad Green II,

deceased; Kelley Conrad Green; and Sandy Pulver v. Corizon Health Care, Inc., et al., civil

action no. 6:13-CV-01855-TC.

Response: Corizon Defendants object to this request as it seeks documents irrelevant to

the facts of this case and is overbroad because the scope of the request far exceeds the needs of

this case. Most of the depositions sought are fact-specific and relate to an event that occurred in

a different county jail involving a different inmate who was treated for a different condition

(unrelated to opiate detoxification) by different people. Further, these Defendants have reason to

believe that many (if not all) of these documents are already in the possession of Plaintiffs.

Request for Production No. 57: A complete copy of all correspondence from defendant

Washington County regarding the quality of care provided at the Washington County Jail by

Prison Health Systems and/or Corizon, including any complaints or concerns regarding the

provision of medical care at Washington County Jail.

Response: To the extent that such documentation exists and is otherwise discoverable,

these Defendants will produce. As of this date, we have not located any such documents, but the

search is continuing.

Request for Production No. 58: A complete copy of all documentation within the

defendants' possession relating to the investigation by the Oregon State Board of Nursing into

Cheryl Buchanan, Molly Johnson, and other Corizon employees, relating to the death of

Madaline Pitkin. This Request is intended to include, but is not limited to, all correspondence

from the defendants to the Oregon State Board of Nursing, including any complaints filed by the

defendants with the Oregon State Board of Nursing as well as any correspondence from the Oregon State Board of Nursing or the Corizon employees under investigation.

Response: Corizon Defendants object to this request as calling for production of documents that are protected by Oregon statute and which are not subject to production or admission in a civil proceeding. See ORS 678.128.

Request for Production No. 59: Complete copies of all correspondence and documentation between the defendants related to the death of Madaline Pitkin.

Response: To the extent that such documentation exists and is not protected by the attorney client privilege and/or the work product doctrine, these documents will be produced.

Request for Production No. 60: Complete copies of the email attachments for the following emails, which were reviewed by Debbie Fye prior to her deposition:

CORIZON005886, CORIZON005887, CORIZON006904, CORIZON006907, CORIZON006878, CORIZON006965, CORIZON006944, CORIZON006945, CORIZON006899, CORIZON006902, CORIZON006903, CORIZON006963, document entitled NET Review 2014.SLSX referenced in CORIZON007042 & CORIZON007043, SAW training provided for nursing as referenced in CORIZON007075 & CORIZON007071, CORIZON007051, form attached by Debbie Fye's email referenced in CORIZON007050, CORIZON006890, CORIZON006892, Corrective Action Plan for Leslie O'Neil referenced in CORIZON006972, Reports dated 5/27/14 and 5/29/14 referred to by Tim Ives in CORIZON005967, documents referenced in CORIZON005968, Statistics report referenced in CORIZON005888, Supervision regulations referenced in CORIZON005549, all final written warning letters referenced by Debbie Fye and Mandy Forsmann in CORIZON005548 & CORIZON007011, final review referenced in CORIZON007010, summary of site visit referenced in CORIZON005823, site visit summary from 10/28/14 – 10/30/14 referenced in CORIZON005884, Audit notes referenced in CORIZON005551, documents attached to CORIZON005550, draft response to the Pamplin Media Group referenced in CORIZON007136, copy of Commander Lenahan's letter referenced in CORIZON007139, and document attached to CORIZON007142.

Response: Corizon defendants object to this request to the extent it attempts to characterize the requested attachments as having been reviewed by Debbie Fye prior to her deposition. Without waiving this objection and subject to it, the requested attachments are being